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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

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JOHN DOE #1 AND JOHN DOE #2,

Case No. 3:21-cv-00485-JCS

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Plaintiffs,

**ADMINISTRATIVE MOTION FOR
LEAVE TO FILE BRIEF OF AMICI
CURIAE ANTI-TRAFFICKING
ORGANIZATIONS IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT TWITTER INC.'S MOTION
TO DISMISS**

17

v.

18 TWITTER, INC.,

19 Defendants.

20 Date: July 30, 2021
21 Time: 9:30 a.m.
Judge: Hon. Joseph C. Spero

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1 Amici Curiae 3Strands Global Foundation, AACI, Bay Area Anti-Trafficking Coalition,
2 Bridge Network, Children’s Advocacy Institute, Coalition Against Trafficking in Women,
3 Community Solutions, Frederick Douglass Family Initiatives, Human Rights for Kids, Love
4 Never Fails, Organization for Social Media Safety, Rights4Girls, and World Without Exploitation
5 (collectively, “Amici”) respectfully move for leave to file an amici curiae brief in the above-
6 captioned matter. Plaintiffs consent to and Defendant takes no position on Amici’s motion. A
7 copy of the proposed amici curiae brief and a proposed order are attached as Exhibits A and B to
8 this motion, respectively.

9 “District courts have broad discretion to appoint amici curiae.” *Levin Richmond Terminal*
10 *Corp. v. City of Richmond*, 482 F. Supp. 3d 944, 951 n.1 (N.D. Cal. 2020) (citing *Hoptowit v.*
11 *Ray*, 682 F.2d 1237, 1260 (9th Cir. 1982)). There are “no strict prerequisites that must be
12 established prior to qualifying for amicus status.” *California by & through Becerra v. United*
13 *States Dep’t of the Interior*, 381 F. Supp. 3d 1153, 1164 (N.D. Cal. 2019). Rather, “an individual
14 seeking to appear as amicus must merely make a showing that his participation is useful or
15 otherwise desirable to the court.” *Id.* Here, Amici bring decades of experience in education,
16 advocacy, and direct services for survivors of human trafficking. Their specific interests are
17 detailed in the Statements of Interest that precede the proposed amici curiae brief. Amici are
18 experts on the devastation caused by online sexual exploitation, on the ways in which online
19 platforms like Twitter exacerbate this abuse, and on the measures Congress has taken to end it by
20 holding companies like Twitter accountable—topics that bear directly on the motion to dismiss
21 currently pending before the Court. In addition, Amici recognize the significant hurdles that
22 survivors face in coming forward. These conditions make it even more critical that trial courts
23 have the benefit of experts in the field at an early stage, to ensure that the development of law
24 does not undermine the willingness of future survivors to enforce their rights.

25 Accordingly, Amici respectfully request leave to file the proposed amici curiae brief,
26 attached hereto as Exhibit A.

1 Dated: June 17, 2021

2 Respectfully submitted,

3 By: /s/ Kelly M. Dermody

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record who receives CM/ECF notification.

DATED this 17th day of June 2021 By: /s/ Kelly M. Dermody
Kelly M. Dermody